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9 **Attorneys for Defendants**

10 **CHASE MANHATTAN BANK U.S.A., N.A., CHASE MANHATTAN BANK**  
11 **U.S.A., N.A. d.b.a. CHASE BANK U.S.A., N.A., and JPMORGAN CHASE**  
12 **& CO.**

13 **UNITED STATES DISTRICT COURT**  
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15 **DAVID J. LEE, and DANIEL R. LLOYD, )**  
16 **as individuals and, on behalf of others )**  
17 **similarly situated, )**

18 **Plaintiffs, )**

19 **vs. )**

20 **CHASE MANHATTAN BANK U.S.A., )**  
21 **N.A., a Delaware corporation, CHASE )**  
22 **MANHATTAN BANK U.S.A., N.A. d.b.a. )**  
23 **CHASE BANK U.S.A., N.A., JPMORGAN )**  
24 **CHASE & CO., a Delaware corporation; )**  
25 **and DOES 1, through 100, inclusive, )**

26 **Defendants. )**

**Case No.: C 07-4732 MJJ**

**CLASS ACTION**

**(Assigned to the Honorable Martin J. Jenkins)**

**STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT**

**Action filed: September 14, 2007**

1 WHEREAS, this action was filed on September 14, 2007;

2 WHEREAS, Defendants CHASE MANHATTAN BANK U.S.A., N.A., CHASE  
3 MANHATTAN BANK U.S.A., N.A. d.b.a. CHASE BANK U.S.A., N.A., were served with the  
4 Complaint on or about September 21, 2007;

5 WHEREAS Defendant JPMORGAN CHASE & CO. was served with the Complaint on  
6 or about September 27, 2007.

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8 WHEREAS, Plaintiffs have agreed that the time for Defendants to answer or file a  
9 motion to dismiss in response to the Plaintiffs' Complaint shall be extended to and including  
10 Thursday, October 25, 2007, pursuant to Local Rule 6-1(a);

11 WHEREAS, Defendants' time to respond has not previously been extended, and;

12 WHEREAS, this Stipulation has been made in good faith and without purpose of delay;

13 IT IS HEREBY STIPULATED AND AGREED, by and between the parties, through  
14 their respective counsel of record, that the time for the Defendants to either answer or file their  
15 motions to dismiss in response to the Complaint shall be extended to and including Thursday,  
16 October 25, 2007.

17 Defendants shall reserve all defenses to the Complaint, and may respond by either  
18 answer or motion to dismiss, to the extent allowable by law.  
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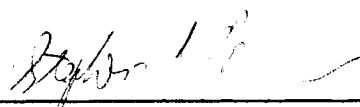
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1 Dated: October 12, 2007

STROOCK & STROOCK & LAVAN, LLP  
JULIA B. STRICKLAND  
STEPHEN J. NEWMAN

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5 By:   
Stephen J. Newman

6 Attorney for Defendants

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8 AMERICAN EXPRESS TRAVEL RELATED  
SERVICES COMPANY, INC., AMERICAN  
9 EXPRESS CENTURION BANK and  
AMERICAN EXPRESS BANK FSB

10  
11 Dated: October 4<sup>th</sup>, 2007

HALE & ASSOCIATES  
MATTHEW S. HALE

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14 By:   
Matthew S. Hale

15 Attorney for Plaintiffs

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17 DAVID J. LEE and DANIEL R. LLOYD  
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